



February 16, 2021

Via Email: [Donald.Lockhart@SacLAFCo.org](mailto:Donald.Lockhart@SacLAFCo.org), [Diane.Thorpe@SacLAFCo.org](mailto:Diane.Thorpe@SacLAFCo.org)

LAFCo

Attention: Don Lockhart AICP, Executive Officer

1112 I Street, Suite 100

Sacramento, CA 95814-2836

RE: Support of Friends of Stone Lakes National Wildlife Refuge on Regional San Proposed Sphere of Influence (SOI) Amendment and Annexation of Harvest Water Area into Regional San for Recycled Water Service Only

Dear Mr. Lockhart:

Friends of Stone Lakes National Wildlife Refuge (Friends) herein offers its support for Sacramento Regional County Sanitation District's (Regional San) Proposed Sphere of Influence (SOI) Amendment and Annexation of Harvest Water Area into Regional San for Recycled Water Service Only (Harvest Water proposal/Program). The basis and qualifications for this support are described below.

Friends of Stone Lakes National Wildlife Refuge

The Friends are a nonprofit organization dedicated to preserving and protecting the Stone Lakes National Wildlife Refuge (Stone Lakes NWR). The Stone Lakes NWR is the single largest complex of natural wetlands, lakes and riparian areas remaining in the Sacramento-San Joaquin Delta, and provides critical habitat for waterfowl and other migratory birds of international concern, as well as a number of endangered plant and animal species. Its location at the south end of a large urban area increases the Refuge's importance as a stop on the Pacific Flyway migratory route. Stone Lakes NWR and the

surrounding agricultural areas are home to several special status species, including the tri-colored blackbird, greater sandhill crane, white-face ibis, long-billed curlew, Swainson's hawk, burrowing owl, giant garter snake and valley elderberry longhorn beetle.

The Stone Lakes NWR's proximity to Elk Grove and urban Sacramento provides unique opportunities for residents to experience the natural environment close to home. Yet, that same proximity presents significant challenges to protecting wildlife and its habitat. A recent Audubon article explained the importance of places such as the Stone Lakes NWR to the Pacific Flyway.<sup>1</sup> It explained that: "The Valley and Delta act as migratory bottlenecks. As birds migrate through these latitudes, they funnel into these study regions. These high concentrations of birds makes them especially vulnerable to threats. Migratory bird conservation efforts and research should therefore focus on these key regions." It is with a goal of protecting these key corridors and habitats that the Friends views Regional San's Harvest Water Program.

### Regional San's Harvest Water Program

The Harvest Water Program, if implemented, would provide recycled water service to a new service area in the southern portion of Sacramento County. These changes include:

- Expansion of the Regional San Sphere of Influence (SOI) to provide recycled water service only, generally to include the area south of the City of Elk Grove, west of the Cosumnes River and east of I-5 (as depicted in the proposed map); and
- Annexation of the same lands into the Regional San Service Area, for Recycled Water Service only.

These changes require LAFCo approval.

---

<sup>1</sup> Audubon Scientists Reveal Migration Bottlenecks Used by Tens of Millions of Birds, Audubon, Jan. 26, 2021, available at: [https://www.audubon.org/news/audubon-scientists-reveal-migration-bottlenecks-used-tens-millions-birds?ms=policy-adv-email-ea-x-engagement\\_20210126\\_western\\_water\\_news&utm\\_source=ea&utm\\_medium=email&utm\\_campaign=engagement\\_20210126\\_western\\_water\\_news&emci=b02c7ac5-2c60-eb11-a607-0003ff1972b7&emdi=d3588da7-3260-eb11-a607-0003ff1972b7&ceid=147629](https://www.audubon.org/news/audubon-scientists-reveal-migration-bottlenecks-used-tens-millions-birds?ms=policy-adv-email-ea-x-engagement_20210126_western_water_news&utm_source=ea&utm_medium=email&utm_campaign=engagement_20210126_western_water_news&emci=b02c7ac5-2c60-eb11-a607-0003ff1972b7&emdi=d3588da7-3260-eb11-a607-0003ff1972b7&ceid=147629)

Regional San's Harvest Water Program (formerly, the South County Ag Program), proposes to provide a safe and reliable supply of tertiary-treated recycled water for agricultural uses, reducing the need for groundwater pumping, and supporting local wildlife habitat enhancement and retention efforts.

### LAFCo's Action

An important charge of LAFCo is to protect agricultural and open space lands. (See Gov. Code, §§ 56300, 56301, 56668, 56377 (b).) The SOI and annexation sought by Regional San for the Harvest Water Program would provide recycled water supplies to agricultural operations for the express purpose of protecting agriculture and wildlife, and also help address regional groundwater overdraft. It is within this context that the Friends offers its qualified support.

### Friends Qualified Support

The Friends' support for the Harvest Water Program and the approvals requested from LAFCo are specifically contingent upon the description of the LAFCo changes being for provision of recycled water service only to local agricultural operations or for habitat enhancement. The Friends does not support any change by LAFCo that could result in or lead to urban or industrial development of the areas proposed for annexation into Regional San's recycled water service area. Neither the underlying EIR nor the recently prepared EIR Addendum analyze the impacts of any other services being provided by Regional San to these new areas.

The Friends supports long term preservation of the Stone Lakes NWR and the lands to the east in agricultural, open space and other wildlife friendly uses to best protect the values of the Stone Lakes NWR and other nearby habitat areas. The Friends believes that the Harvest Water Program will promote this goal.

The Friends has reviewed Regional San's Map, Plan for Service, and draft Municipal Services Review, which clearly delineate the newly annexed land as a specific area exclusively for the distribution of treated wastewater for agricultural use or habitat enhancement. The Friends expects that printed and online regional boundary maps prepared by Regional San and LAFCo will include this same information. The Friends believes that a specific limitation to this effect should also be a condition of LAFCo's approvals of the SOI and annexation. Such a clear demarcation would help prevent any misunderstanding of the present expansion of SOI and annexation by would-be developers of the status of the annexed lands with respect to provision of services by Regional San.

\* \* \*

Please feel free to contact me if you have any questions about the Friend's position on the Harvest Water Program and upcoming LAFCo decisions thereon.

Sincerely,

A handwritten signature in black ink that reads "Scott Finley". The signature is written in a cursive style with a large initial 'S'.

Scott Finley  
President, Friends of Stone Lakes NWR

cc: Bart McDermott, Refuge Manager, Stone Lakes NWR, [bart\\_mcdermott@fws.gov](mailto:bart_mcdermott@fws.gov)  
Terrie Mitchell, Sac Regional, Manager of Harvest Water A-PMO,  
[mitchellt@sacsewer.com](mailto:mitchellt@sacsewer.com)